

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
SAMUEL KARNES, MOLLY WASHAM, ADAM
BETTENCOURT, and LAURA PETREE,
Plaintiffs,

**STIPULATION AND
ORDER OF DISMISSAL**

-against-

21 CV 4903 (WFK) (JRC)

THE CITY OF NEW YORK; MAYOR BILL DE
BLASIO; NEW YORK CITY POLICE
DEPARTMENT ("NYPD") COMMISSIONER
DERMOT SHEA; NYPD CHIEF OF DEPARTMENT
TERENCE MONAHAN; NYPD DETECTIVE
MICHAEL MCCAFFREY; NYPD SERGEANT
GERARD M. CAFFREY; NYPD DETECTIVE
DANIEL HERZOG; NYPD OFFICER FNU MOSES
and NYPD MEMBERS JOHN AND JANE DOES 1-
18,

Defendants.
----- X

WHEREAS, plaintiff Petree and defendants have reached a settlement agreement and now desire to resolve the remaining issues raised in this litigation with respect to the claims brought by plaintiff Petree, without further proceedings and without admitting any fault or liability;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that

1. The above-referenced action is hereby dismissed with prejudice solely in connection with the claims brought by plaintiff Petree; and


2. Notwithstanding the dismissal of this action solely in connection with the claims brought by plaintiff Petree in accordance with this agreement, the District Court shall continue to retain jurisdiction over this action for the purpose of enforcing the terms of the settlement agreement reached between the parties and set forth in the Stipulation of Settlement executed by the parties in this matter.

Dated: New York, New York
June 10, 2025

COHEN & GREEN PLLC
Elena Cohen, Esq.
Attorney for Plaintiffs
1639 Centre Street, Suite 216
Ridgewood, New York 11385

MURIEL GOODE-TRUFANT
Corporation Counsel of the
City of New York
Attorney for Defendants
100 Church Street, 3rd Floor
New York, New York 10007

By: Elena Cohen
Elena Cohen, Esq.
Attorney for Plaintiffs

By: 
 Brian Francolla
Senior Counsel

SO ORDERED:

HON. WILLIAM F. KUNTZ
UNITED STATES DISTRICT JUDGE

Dated: _____, 2025